

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JDP MORTGAGE LLC,

Civil Action No.: 19-cv-05968(JS)(SIL)

Plaintiff,

-Against-

**NOTICE OF MOTION TO
COMPEL DISCOVERY**

MICHELE ANN GOSMAN,

Defendant.
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PLEASE TAKE NOTICE THAT upon the annexed declaration of CHRISTOPHER THOMPSON, ESQ., the attorney for Plaintiffs dated October 5, 2020 with attached exhibits and materials and the annexed Memorandum of Law, Plaintiffs by their undersigned attorney, will move this Court at the United States Courthouse for the Eastern District of New York, located at 100 Federal Plaza, Central Islip, NY 11722 before the Honorable Magistrate Judge Steven I. Locke for an Order:

1. To compel Plaintiff pursuant to Fed. R. Civ. P. 37(A)(3)(B)(iv) to produce: (a) All Documents or Communications relating to, or evidencing the office location and or locations of JDP Mortgage LLC. (b) All Documents or Communications relating to, or evidencing the members of JDP Mortgage LLC from its inception to the date of the response to this discovery request. (c) All Correspondence, Documents or Communications relating to, or evidencing the purchase of the Note and mortgage which is the subject of this action. (d) All Correspondence, Documents or Communications relating to, or evidencing the purchase price for the Note and mortgage which is the subject of this action. (e) All Correspondence, Documents or Communications relating to, or evidencing the payment of the purchase price for the Note and mortgage which is the subject of this action. (f) All Correspondence,

Documents or Communications relating to, or evidencing the servicing of the Note and mortgage which is the subject of this action, including but not limited to the “Good Bye” and “Hello” letters required to service such loan. (g) Any and all records of any and all communications and/or any and all agreements, including but not limited to agreements, exchanged between Plaintiff and predecessor in interest in any way relating to the Note and Mortgage issued in connection with the Premises, all as demanded pursuant to Fed. R. Civ. P. 34.

2. For such other and further relief as is just and proper.

A memorandum of law and Declaration of CHRISTOPHER THOMPSON, ESQ., with Exhibits supporting this motion are filed contemporaneously herewith. As required by Fed. R. Civ. P. 37 and the Local Rules.

In accordance with the Court’s Order of September 24, 2020, Plaintiff must serve but not file any opposition on or before November 2, 2020 and the Defendant shall serve but not file any reply on or before November 16, 2020 with all papers being filed with the Court on or before November 17, 2020.

Dated: West Islip, New York
October 5, 2020

Respectfully submitted,

CHRISTOPHER THOMPSON, ESQ.
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